

1 MICHAEL W. BIEN – 096891
2 ERNEST GALVAN – 196065
3 KARA J. JANSSEN – 274762
4 GINGER JACKSON-GLEICH – 324454
5 ROSEN BIEN
6 GALVAN & GRUNFELD LLP
7 101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
Telephone: (415) 433-6830
Email: mbien@rbgg.com
egalvan@rbgg.com
kjanssen@rbgg.com
gjackson-gleich@rbgg.com

OREN NIMNI*
Mass. Bar No. 691821
AMARIS MONTES*
Md. Bar No. 2112150205
D DANGARAN*
Mass. Bar No. 708195
RIGHTS BEHIND BARS
416 Florida Avenue N.W. #26152
Washington, D.C. 20001-0506
Telephone: (202) 455-4399
Email: oren@rightsbehindbars.org
amaris@rightsbehindbars.org
d@rightsbehindbars.org

8 SUSAN M. BEATY – 324048
9 CALIFORNIA COLLABORATIVE FOR
IMMIGRANT JUSTICE
10 1999 Harrison Street, Suite 1800
Oakland, California 94612-4700
Telephone: (510) 679-3674
Email: susan@ccijustice.org

**Pro hac vice* applications pending

12 Attorneys for Plaintiffs

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

15 CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
16 G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,
17 Plaintiffs,

18 v.

19 UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
20 BUREAU OF PRISONS DIRECTOR COLETTE
PETERS, in her official capacity; FCI DUBLIN
WARDEN THAHESHA JUSINO, in her official
capacity; OFFICER BELLHOUSE, in his
individual capacity; OFFICER GACAD, in his
individual capacity; OFFICER JONES, in his
individual capacity; LIEUTENANT JONES, in
her individual capacity; OFFICER LEWIS, in his
individual capacity; OFFICER NUNLEY, in his
individual capacity, OFFICER POOL, in his
individual capacity, LIEUTENANT PUTNAM, in
his individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ, in
her individual capacity,

28 Defendants.

Case No. 3:23-cv-04155

**DECLARATION OF OREN
NIMNI IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR
PRELIMINARY INJUNCTION
AND PROVISIONAL CLASS
CERTIFICATION**

1 I, Oren Nimni, declare:

2 1. I am an attorney barred in the State of Massachusetts, a pro hac vice motion is
 3 forthcoming before this Court. I am the Litigation Director of Rights Behind Bars
 4 (“RBB”), a non-profit law office in Washington, D.C., and counsel of record for the
 5 Plaintiffs and Proposed Class. I have personal knowledge of the facts set forth herein, and
 6 if called as a witness I could competently so testify. I make this declaration in support of
 7 Plaintiffs’ Motion for Provisional Class Certification.

8 2. As a Litigation Director at RBB, I direct the litigation docket of RBB and
 9 represent clients on that docket. The organization’s docket is comprised almost entirely of
 10 conditions of confinement matters in the federal district courts and courts of appeals.
 11 Currently we represent individuals, classes, and organizations challenging conditions of
 12 confinement in local jails, state prisons, federal prisons, and immigration detention centers
 13 across the country.

14 3. Rights Behind Bars has unique expertise in prison litigation matters. I have
 15 served as counsel for dozens of incarcerated individuals arguing complex doctrinal matters
 16 of prison law. *See e.g. Durham v. Kelly* (21-3187) (3rd Cir.); *Cason v. Maryland DOC*
 17 (21-6290) (4th Cir.); *Wise v. Maruka* (21-6816) (4th Cir.); *Richardson v. Clarke* (21-6507)
 18 (4th Cir.) *Longworth v. Mansukhani* (21-7609) (4th Cir.); *Koon v. North Carolina* (21-
 19 6616) (4th Cir.); *Pinkston v. Kuiper* (21-60320) (5th Cir.); *Class v. Davis* (21-20560) (5th
 20 Cir.); *Douthit v. Collier* (20-20550) (5th Cir.); *Marlowe v. LeBlanc* (20-30738) (5th Cir.);
 21 *Savage v. LeBlanc* (22-30125) (5th Cir.); *Taylor v. Collier* (22-20398) (5th Cir.); *Creech v.*
 22 *Ohio DOC* (21-3722) (6th Cir.); *Fugate v. Erdos* (21-4025) (6th. Cir.); *Larson v. Eppinger*
 23 *et al* (22-4029) (6th Cir.); *Williamson v. Wheeler at al.* (22-4017) (6th Cir.); *Shaw v.*
 24 *Kemper* (21-3265) (7th Cir.); *Torres v. Brookman* (22-2830) (7th Cir.); *Starr v. Bland* (21-
 25 2476) (8th Cir.); *Morris v. California* (21-16059) (9th Cir.); *Briceno v. Williams* (21-
 26 55624) (9th Cir.); *Chernetsky v. State of Nevada* (21-16540) (9th Cir.) ; *Pamplin v. Lucas*
 27 (22-15284) (9th Cir.); *Seidner v. DeVries* (20-17403) (9th Cir.); *Marquez v. Rodriguez* (21-
 28 55981) (9th Cir.); *Standard v. Dy* (21-35582) (9th Cir.); *Silva v. United States* (21-1008)

1 (10th Cir.); *Wheat v. Day*, (20-14142) (11th Cir.).

2 4. Rights Behind Bars also has expertise in litigating complex prison matters in
 3 the federal district courts, including cases involving issues of alleged guard assault and
 4 class action litigation. I have served as counsel in numerous such cases. *See e.g. Rivas v.*
 5 *Hodgson* (1:18-cv-11275-PBS) (D. Mass.); *Savino et al v. Souza* (1:20-cv-10617-WGY)
 6 (D. Mass.) (class action); *Pillco Morocco v. Bristol County Sheriff's Office* (1:22-cv-
 7 10652-WGY) (D. Mass); *Juarez v. SoFi* (4:20-cv-03386-HSG) (N.D. Cal.) (class action);
 8 *Jones v. City of St. Louis* (4:21-cv-00600-HEA) (E.D. Mo.) (class action); *Tillman v. City*
 9 *of St. Louis* (4:21-cv-00299-RLW) (E.D. Mo.); *Garrett v. Virginia Department of*
 10 *Corrections* (3:20-cv-00986-JAG) (E.D. Va); *Johnson v. McCowan* (7:20-cv-00582-MFU-
 11 JCH) (W.D. Va); *Ahn v. GEO Group LLC* (1:22-cv-00586-JLT-CDB) (E.D. Cal); *Edwards*
 12 *v. Buffalo* (5:21-cv-03270-D) (E.D. N.C.); *Washington v. Massachusetts Department of*
 13 *Corrections* (1:23-cv-10063) (D. Mass).

14 5. I have also worked with people advocating for clients at FCI Dublin and with
 15 people incarcerated at FCI Dublin for approximately the past 2 years and am intimately
 16 familiar with the issues attendant to the facility.

17 6. I graduated from the Northeastern School of Law in 2014. I was admitted to
 18 the Massachusetts Bar in 2014 and am also a member of the bars of the Districts of
 19 Massachusetts, Colorado, and N.D. Illinois, and the First, Third, Fourth, Fifth, Sixth,
 20 Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits, as well as the Supreme Court of the
 21 United States.

22 7. Since being retained to pursue this action, I have devoted substantial
 23 resources to this case. My colleagues at RBB and I are committed to the full and thorough
 24 preparation of this case and to acting in the best interests of the class, and are willing to
 25 take this case to trial. As an organization whose mission is to use the law to address
 26 systemic issues incarcerated individuals, RBB is committed to zealously pursuing this
 27 matter. To my knowledge, RBB has no conflicts of interest that would prevent the firm
 28 from providing zealous representation of the named plaintiffs and the class.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct, and that this declaration is executed at Oakland California
3 this 15th day of August, 2023.

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Oren Nimni
RIGHTS BEHIND BARS
416 Florida Ave. NW #26152
Washington, D.C. 20001
oren@rightsbehindbars.org
(202) 540-0029
Honorable: Mr.
Pronouns: He/Him/His